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March 2, 2009

**Via Electronic Filing**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

**Re: Vonage Holdings Corp. - CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Vonage Holdings Corp. ("Vonage"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2008 CPNI compliance certification.

Please direct any questions regarding this submission to the undersigned.

Very truly yours,

*/s/ Ronald W. Del Sesto, Jr.*

Ronald W. Del Sesto, Jr.

Enclosure

cc: Best Copy and Printing, Inc. (via E-Mail)

Boston  
Hartford  
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Washington

**VONAGE HOLDINGS CORP.  
SECTION 64.2009(E) CERTIFICATION  
FOR CALENDAR YEAR 2008  
EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2008

**Date filed:** March 2, 2009

**Name of company covered by this certification:** Vonage Holdings Corp.

**Form 499 Filer ID:**825971

**Name of signatory:** Vito Carnevale

**TITLE OF SIGNATORY:** Vice President Law

I, Vito Carnevale, a duly authorized officer of Vonage Holdings Corp., hereby certify on behalf of interconnected Voice over Internet Protocol provider Vonage America Inc. ("Vonage"), a wholly owned subsidiary of Vonage Holdings Corp., that I have personal knowledge that Vonage has established operating procedures that were adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

Attached to this certification is an accompanying statement and a confidential exhibit explaining the company's compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended for calendar year 2008.

Vonage has not taken any actions against data brokers in the past year. Vonage has not received any customer complaints in the past year concerning the unauthorized release of CPNI. But, as explained in Attachment A, Vonage has engaged in certain actions in order to protect its customers' and third parties from potential fraud.



Vito Carnevale  
Vice President Law  
Vonage Holdings Corp.  
March 2, 2009

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)  
FOR CALENDAR YEAR 2008**

The following statement explains how the operating procedures of Vonage America Inc., ("Vonage"), an interconnected voice over Internet protocol ("VoIP") provider, ensured that Vonage was in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U, for calendar year 2008.<sup>1</sup>

**1. Use of customer proprietary network information without customer approval.**

As permitted by the CPNI rules,<sup>2</sup> Vonage may use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Vonage, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding and certain other Centrex features; and (6) to market services among the categories of service to which the customer already subscribes from Vonage.

Vonage used individually identifiable CPNI for the provision of interconnected VoIP service from which the CPNI is derived, to provide customer support related to such service, and to bill and collect for such service. Vonage also used individually identifiable CPNI to protect its rights or property, or to protect users of its interconnected VoIP service and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services. Vonage also used individually identifiable CPNI to market service offerings among the categories of service to which its customers already subscribed. Vonage did not use CPNI to track customers that call competing service providers.

**2. Approval required and notification for use of customer proprietary network information.**

As discussed above, Vonage used individually identifiable CPNI to provide service, to provide support to customers of its service, to bill and collect for its service, and to market services among the categories of service to which the customer already subscribes from Vonage. Vonage did not use or permit the use of individually identifiable CPNI for marketing outside of the categories of service to which the customer already subscribes from Vonage. As a result, Vonage did not make use of individually identifiable CPNI in a way that would require notice of such use and customer approval.

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<sup>1</sup> Except for Vonage America Inc., none of the other subsidiaries of Vonage Holdings Corp. offered services subject to the Commission's CPNI rules in 2007.

<sup>2</sup> In this statement, the term customer proprietary network information or CPNI means "Customer Proprietary Network Information" as that term is defined at 47 U.S.C. § 222(h)(1).

### **3. Safeguards required for use and disclosure of customer proprietary network information.**

*Safeguarding CPNI.* For live telephonic support, a Vonage customer must provide his/her personal identification number ("PIN") to a Vonage agent and the agent must enter this PIN before the agent can access the customer's CPNI in Vonage's customer care system. In addition, a password is required for a customer to gain access to his/her CPNI information online. If the customer cannot provide his/her PIN for live telephonic support or his/her password for online account access, Vonage also has a backup authentication method. These protections are discussed in more detail below.

Additionally, the customer care related systems record how the customer was verified (e.g. by password or backup authentication if the customer forgot the password) for each call handled by an agent. The customer care systems also record any access by an agent to CPNI while the customer is not on the telephone and the reason why the agent accessed the CPNI. Vonage also maintains a log of changes to a customer's online or telephone account access passwords, backup authentication questions, email address, or physical address.

*Telephone access to CPNI.* All customers who purchased service over the telephone in 2008 received a personal identification number ("PIN") via email. This PIN must be used by the customer to access his/her CPNI on calls into Vonage customer care. Similarly, customers who purchased service on the Vonage website in 2008 were given a PIN for telephonic access to their account, as part of the subscription process.

*Online access to CPNI.* Vonage customers must provide a password to access CPNI online. For customers that purchased service online, establishment of a password for online access is part of the subscription process. Customers who subscribe over the telephone are sent a temporary password for online access to the email address that was provided by the customer during the subscription process. The email message also instructs the customer to log on to his/her online account to personalize the password. If the customer does not log on to his/her online account and personalize his/her password within 7 days, Vonage sends the customer an email reminder to log on and personalize his/her password.

*Backup authentication:* Vonage has established a backup authentication method based on a user selected security question and the customer's answer to the selected question. These questions are not based on readily available biographical information or account information. When customers that subscribed over the telephone log on to their account for the first time, they must select a security question and provide an answer as a backup authentication method. Customers that subscribed online must select a security question and answer as part of the subscription process.

*Notification of account changes.* Vonage sends email notification of account changes to customers at their email address of record. Customers receive notice for changes to their password, PIN, security questions, and E911 address.

*Training/Discipline.* Vonage has trained its employees and personnel as to when they are and are not authorized to use or access CPNI, and the Company has an express disciplinary process in

place in the event CPNI policies and procedures are not followed. In this regard, as access to CPNI is considered confidential and proprietary to Vonage, it falls within the disciplinary policy of Vonage's Information Security Policy. As such, employees are subject up to, and including termination of employment or access to CPNI, if they conduct the access in a manner that is not in compliance with the FCC rules.

**ATTACHMENT A**  
**TO STATEMENT OF VONAGE HOLDINGS CORP.**  
**REGARDING OPERATING PROCEDURES**  
**IMPLEMENTING 47 C.F.R. PART 64 SUBPART U**  
**GOVERNING USE OF**  
**CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**  
**FOR CALENDAR YEAR 2008**

**REDACTED**